



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

August 3, 2011

Gregory S. Punske, P.E.
District Engineer
Texas Division
Federal Highway Administration
300 E. 8th Street, Room 826
Austin, TX 78701-3255

Dear Mr. Punske,

This letter is in response to the Federal Highway Administration's (FHWA) request for the Environmental Protection Agency (EPA) to review and provide comments on the Draft SAFETEA-LU Section 6002 Coordination Plan for the proposed Environmental Impact Statement (EIS) for the proposed United States (US) Highway 181 Harbor Bridge replacement/State Highway (SH) 286 improvement project in Corpus Christi, Nueces County, Texas. The draft coordination plan will facilitate and document the lead agencies' structured interaction with the public and agencies and is meant to promote an efficient and streamlined process for the environmental review process for the proposed project.

We have reviewed the draft coordination plan and provide these comments:

2.0 Project History

A more detailed explanation of the process and methodology by which the four preliminary corridors were developed is needed. This information can be provided in the plan or the plan should incorporate by reference the 2001 Feasibility Study.

3.1 Alternatives

This section identifies and describes the four build alternatives previously developed in the 2001 Feasibility Study. Is it in the realm of this coordination plan and scoping effort to develop additional preliminary alternatives or is the alternatives analysis limited to the previously described corridors?

4.1 Draft Need - Roadway and Structure Deficiencies

Under *High Maintenance Costs*, it would be beneficial to include the annual maintenance costs and activities to support the need.

Under *Roadway Capacity Constraints*, the term weaving should be explained in layman's terms so the average reader will understand.

5.0 Agency Roles and Responsibilities – Table 5.0-1

The EPA's responsibilities should include water quality and Section 404 CWA compliance.

8.0 Detailed Project History and Future Actions

Number 54, Anticipated 2017, states that TxDOT will obtain necessary permits, licenses, or approvals after ROD. As the Corps is likely to be a cooperating agency, a NEPA/404 merger agreement could be investigated to streamline the permitting process so the permit could be issued with the ROD.

We look forward to continued involvement and cooperation in the EIS development for the Harbor Bridge project. If you have any further questions, please contact John MacFarlane at 214-665-7491 or macfarlane.john@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Rhonda Smith", with a stylized flourish at the end.

Rhonda Smith
Chief, Office of Planning and
Coordination